



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

JUL 30 2009

Reply To: OCE-084

Ms. Krista Parent, Superintendent
South Lane School District #45J3
P.O. Box 218, 455 Adams
Cottage Grove, Oregon 97424

Mr. Ron Lester, Facilities Manager
South Lane School District #45J3
P.O. Box 218, 455 Adams
Cottage Grove, Oregon 97424

Re: PCB Remediation Plan Extension Approval

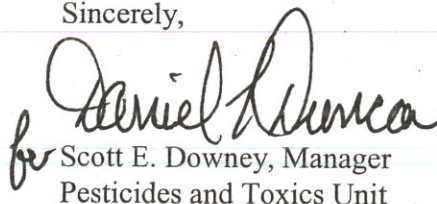
Dear Ms. Parent and Mr. Lester:

The Environmental Protection Agency, Region 10 (EPA) has reviewed your May 21, 2009 extension request for your July 18, 2008, letter and Work Plan for Polychlorinated Bi-Phenyl (PCB) sampling, cleanup, and removal of PCB contamination which resulted from releases of Toxic Substances Control Act (TSCA) regulated PCBs in the South Lane District schools (Bohemia Elementary and Lincoln Middle School) located in Cottage Grove, Oregon. Your May 21, 2009, extension request for your July 18, 2008, PCB Remediation Plan, is acceptable to EPA. Please see our enclosed approval. We understand that the PCB Remediation will now be completed in three separate phases by December 31, 2010.

The South Lane School District is responsible for complying with requirements of other federal laws and applicable Oregon State requirements under Oregon Administrative Rule (OAR) 340-122-047, "Generic Remedies For Soils Contaminated With Polychlorinated Bi-Phenyls (PCBs)".

If you have any questions, please contact Mr. Daniel Duncan, Regional PCB Program Coordinator, at (206) 553-6693 or by e-mail duncan.daniel@epa.gov. If you have any questions on PCB sampling methods, please contact Mr. Don Matheny, Quality Assurance Team, Office of Environmental Assessment at (206) 553-2599.

Sincerely,


for Scott E. Downey, Manager
Pesticides and Toxics Unit

Encl: as

cc: Mr. Matt Daly- Willamette ESD

South Lane School District 45J3: Bohemia Elementary School and Lincoln Middle School, Cottage Grove, Oregon. July 18, 2008 PCB Remediation Plan: May 2009 Extension Request Approval.

Consistent with your plan, the South Lane School District will perform the following actions:

1. The South Lane School District will complete the following by December 31, 2010:
 - a. The complete characterization of the South Land School District Bohemia Elementary School and Lincoln Middle School, in accordance with 40 C.F.R. Part 761, Subpart N: Site Characterization Sampling for PCB remediation Waste under 40 C.F.R. § 761.61(a)(2).
 - b. The removal of all PCB waste from the South Land School District Bohemia Elementary School and Lincoln Middle School located in Cottage Grove, Oregon.
 - c. The disposal/incineration of all PCB remediation waste, from the South Land School District Bohemia Elementary School and Lincoln Middle School located in Cottage Grove, Oregon, with a PCB concentration of < 50 ppm in accordance with 40 C.F.R. § 761.61(a)(5)(i)(B) (2)(ii) and 40 C.F.R. § 761.61(a)(5)(v)(A), in a state regulated municipal waste landfill, a RCRA Subtitle C landfill, a non-hazardous non-municipal waste landfill subject to the requirements of 40 C.F.R. § 257.5 through 257.30, or in a chemical waste landfill or at an incinerator approved by the EPA to accept PCB waste subject to the Toxic Substances Control Act (TSCA).
 - d. The disposal/incineration of all PCB remediation waste, from the South Land School District Bohemia Elementary School and Lincoln Middle School located in Cottage Grove, Oregon, with a PCB concentration of \geq 50 ppm in accordance with 40 C.F.R. § 761.61(a)(5)(i)(B)(2)(ii), in a state regulated hazardous waste landfill permitted by EPA under section 3004 of RCRA, or permitted by a state under section 3006 of RCRA, or in a chemical waste landfill or at an incinerator approved by the EPA to accept PCB waste subject to the Toxic Substances Control Act (TSCA).
 - e. The disposal/incineration of all PCB bulk product waste, including fluorescent light ballasts containing PCBs in the potting compound, from the South Land School District Bohemia Elementary School and Lincoln Middle School located in Cottage Grove, Oregon in accordance with 40 C.F.R. §§ 761.62(a)(1) - (7).
 - f. Provide copies of Certificates of Disposal for the disposal of the PCB wastes.
 - g. Provide copies of Certificates of Destruction for the incineration of the PCB wastes.
 - h. The identification on all appropriate facility drawings at from the South Land School District Bohemia Elementary School and Lincoln Middle School

located in Cottage Grove, Oregon of the existence of TSCA regulated PCB waste and contamination, if any, that is left in place at the South Land School District Bohemia Elementary School and Lincoln Middle School located in Cottage Grove, Oregon. This identification should indicate the need for additional precautions during future modification, renovation, or demolition of the facility.

- i. Perform the required PCB verification sampling in accordance with 40 C.F.R. §§ 761.61(a)(6)(i)-(ii).
 - j. Perform the required PCB verification sampling analysis using PCB Methods 3500B/3540C or Method 3500B/3500B and the chemical analyses by EPA Method 8082 in accordance with 40 C.F.R. § 761.61(a)(5)(iv) and 40 C.F.R. § 761.292 (Subpart O).
 - k. Retain the records required under 40 C.F.R. §§ 761.125(c)(5)(i)-(iv) and 40 C.F.R. §§ 761.61(a)(3) - (a)(5).
2. The South Land School District will provide to EPA Region 10 and the Oregon Department of Environmental Quality (ODEQ) an annual report and a final report documenting the completion of the above items. The annual report will be provided no later January 30, 2010 for the calendar year ending December 31, 2009, and a final report no later than January 30, 2011 for the PCB remediation. These reports will also include:
 - a. The results of the removal of all PCBs to less than 1 ppm PCBs.
 - b. Information on additional pre- and post-cleanup sampling as well as the estimated cost of the cleanup by man-hours and dollars in accordance with 40 C.F.R. §§ 761.61(a)(6)(i)-(ii) and 40 C.F.R. § 761.61(a)(9) and 40 C.F.R. §§ 761.125(c)(5)(i-ix). Although not required for compliance with the PCB Spill Cleanup Policy at 40 C.F.R. § 761.125 (c)(5), this information should also be maintained by the South Lane School District as well as the Oregon Department of Environmental Quality.
 - c. The quantity of PCBs in kilograms disposed of as well as the number of acres remediated under this 40 C.F.R. § 761.61(a) approval.